

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARTINE THOMAS individually and as Parent and  
Natural Guardian of A.T *et al*,

Plaintiffs,

- against -

**DECLARATION OF  
JAIMINI VYAS**

24-cv-5138-JLR

DAVID C. BANKS, in his official capacity as Chancellor  
of the New York City Department of Education, and THE  
NEW YORK CITY DEPARTMENT OF EDUCATION,

Defendants.  
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Jaimini Vyas, an attorney duly admitted to practice law in the State of New York and before this Court, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct:

1. The undersigned is an Assistant Corporation Counsel within the General Litigation Division of the New York City Law Department representing Defendants David C. Banks and the New York City Department of Education (collectively, “Defendants”) in this matter, and is fully familiar with the facts asserted herein.

2. This Declaration is submitted in support of Defendants’ Opposition to Plaintiffs’ fourth motion for a preliminary injunction and demand for a temporary restraining order, ECF 84-85.

3. Attached hereto as Exhibit A is a copy of the Transcript of the January 17, 2025,<sup>1</sup>

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<sup>1</sup> The first page of the transcript contains a typographical error in stating that the conference took place on January 17, 2024 rather than the accurate January 17, 2025 date.

Order denying Plaintiffs' third emergency motion for a preliminary injunction and temporary restraining order (TRO) demanding expedited payments for pendency in *Thomas et al. v. Banks et ano.*, 24-cv-5138 (JLR).

4. Attached hereto as Exhibit B is a copy of the Transcript of the September 4, 2024, Order denying Plaintiffs' second emergency motion for a preliminary injunction and TRO demanding expedited payments for pendency in *Thomas et al. v. Banks et ano.*, 24-cv-5138 (JLR).

Dated: June 2, 2025  
New York, New York

**MURIEL GOODE-TRUFANT**

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Jaimini A. Vyas  
*Assistant Corporation Counsel*